

1 **HONE LAW**
2 Kelly B. Stout, NV Bar No. 12105
3 kstout@hone.law
4 701 N. Green Valley Parkway, Suite 200
5 Henderson, NV 89074
6 Phone 702-608-3720
7 Fax 702-608-7814

8
9 *Attorneys for Plaintiffs*
10 *Christina Jordan, Renee Dean, and Wendy Regge*

11
12 IN THE UNITED STATES DISTRICT COURT
13
14 DISTRICT OF NEVADA

15 CHRISTINA JORDAN,
16 Plaintiff

17 Consolidate for Discovery
18 Case No. 2:21-cv-02228-CDS-NJK

19 WYNDHAM VACATION OWNERSHIP,
20 INC., a Nevada corporation; DEMETRIUS
21 BARNES-VAUGHN, an individual; DOES I
22 through X, inclusive; and ROE BUSINESS
23 ENTITIES, I through X, inclusive,
24 Defendants

25 **STIPULATION AND ORDER
26 TO CONTINUE STAY FOR
27 ADDITIONAL 60 DAYS**

28 **(Second Request)**

29 WENDY REGGE,
30 Plaintiff

31 vs.
32 WYNDHAM VACATION OWNERSHIP,
33 INC., et al.,
34 Defendants

35 RENEE DEAN,
36 Plaintiff

37 vs.
38 WYNDHAM VACATION OWNERSHIP,
39 INC., et al.
40 Defendants



1 Pursuant to the Court's February 13, 2024 Order [ECF 106], Plaintiffs Renee Dean
 2 ("Dean"), Christina Jordan ("Jordan"), and Wendy Regge ("Regge," and collectively,
 3 "Plaintiffs") and Defendants Wyndham Vacation Ownership, Inc. ("Wyndham") and Demetrius
 4 Barnes-Vaughn ("Barnes-Vaughn," and collectively, "Defendants"), by and through their
 5 respective counsel of record, hereby file this Joint Status Report and Stipulation and Order to
 6 Stay Case for Additional 60 Days (Second Request).

7 1. On the morning of February 5, 2024, Jill Garcia, Plaintiffs' lead counsel,
 8 unexpectedly passed away.

9 2. On February 13, 2024, the Court granted the Parties' stipulation and ordered that
 10 this matter be stayed for 30 days, and that a Joint Status Report ("Report") be filed on or before
 11 March 14, 2024. [ECF 106.]

12 3. During the last 30 days, Hone Law has reviewed and assessed each of the more
 13 than 40 open cases that Ms. Garcia was handling and determined that it does not have the
 14 capacity to continue to represent the three Plaintiffs in this action.

15 4. Accordingly, Hone Law has informed each of the Plaintiffs that it will need to
 16 withdraw from their cases and anticipates filing a Stipulation/Motion to Withdraw as Counsel
 17 within the next seven days.

18 5. While Plaintiffs have already begun searching for new counsel (and Hone Law
 19 will continue to assist and facilitate the transition to Plaintiffs' new counsel), Plaintiffs require
 20 additional time to retain counsel, allow their new counsel to confer with each Plaintiff, and
 21 assess the time that will be required to complete discovery in these three consolidated matters.

22 6. On March 12, 2024, Plaintiffs' counsel met and conferred with Defendants'
 23 counsel and Defendants' counsel confirmed that they have no objection to Hone Law's
 24 withdrawal.

25 7. For the forgoing reasons, the Parties hereby stipulate and agree to continue the
 26 stay for an additional 60 days.

27 ///
 28 ///

1 8. The Parties further stipulate and agree that on or before May 13, 2024, the Parties
2 will file a joint status report that shall include a proposal for completing discovery in this matter.

3 Dated this 13th day of March 2024.

4 HONE LAW

5 /s/ Kelly B. Stout

6 Kelly B. Stout, NV Bar No. 12105
kstout@hone.law
701 N. Green Valley Parkway, Suite 200
7 Henderson, Nevada 89074

8 *Attorneys for Plaintiffs*

9 *Renee Dean, Christina Jordan, and
Wendy Regge*

Dated this 13th day of March 2024.

JACKSON LEWIS P.C.

/s/ Kathleen C. Shea

Kirsten A. Milton, NV Bar No. 14401
Kirsten.milton@jacksonlewis.com
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101

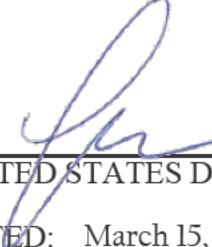
Kathleen C. Shea (admitted *Pro Hac Vice*)

Kathleen.Shea@jacksonlewis.com
390 N. Orange Avenue, Ste. 1285
Orlando, Florida 32801

Attorneys for Defendants

*Wyndham Vacation Ownership, Inc. and
Demetrius Barnes-Vaughn*

13 **IT IS SO ORDERED.**

14 
15 _____
16 UNITED STATES DISTRICT JUDGE

17 DATED: March 15, 2024

21
22
23
24
25
26
27
28